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VIA FIRST CLASS MAIL

April 25, 2006

Flavia Benitez
 PO Box 2437
 Jamaica Plain, MA 02130

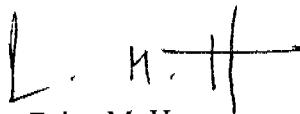
RE: Flavia Benitez v. Sodexo Marriott Services
U.S. District Court, Civil Action No.: 04-CV-11959-NG

Dear Ms. Benitez:

Enclosed please find Defendant's Answers to Plaintiff's Second Set of Interrogatories.

Thank you for your attention in this matter.

Very truly yours,


 Brian M. Haney

enclosure

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FLAVIA BENITEZ,)
Plaintiff,)
v.) Civil Action No: 04-11959-NG
SODEXHO MARRIOTT SERVICES,)
Defendant.)

**DEFENDANT'S ANSWERS TO
PLAINTIFF'S SECOND SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, the defendant, Sodexho, Inc. ("Sodexho"), misnamed herein as Sodexho Marriott Services, hereby responds to Plaintiff's Interrogatories to the Defendant as follows:

GENERAL OBJECTIONS AND STATEMENTS

1. The defendant objects to each interrogatory to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial, subject to the attorney-client privilege, or any other privilege or protection, not reasonably calculated to lead to the discovery of admissible evidence or otherwise not within the scope of discovery permitted by the Federal Rules of Civil Procedure. No such information or documents shall be produced and any inadvertent production of such information or documents shall not be deemed and is not intended as a waiver of such.

2. The defendant objects to the Interrogatories to the extent they are unreasonably cumulative or duplicative, or seek information obtainable from some other source that is more convenient, less burdensome, or less expensive.

3. The defendant objects to any interrogatory that purports to impose a duty

on it to undertake a search or an evaluation of information, documents or things for which the plaintiff is equally able to search and evaluate.

4. The defendant objects to the plaintiff's Interrogatories as unduly burdensome in that as drafted they are compound, vague and ambiguous.

5. The defendant objects to any interrogatory that purports to limit the defendant's evidence in this action to particular documents, witnesses or information disclosed herein.

6. The defendant objects to the plaintiff's Interrogatories to the extent they are not related to the time period or subject matter at issue with respect to the claims in this litigation.

7. The defendant objects to any interrogatory that purports to impose a duty on it to provide information in the possession of former employees, consultants, agents and representatives.

8. The defendant reserves the right to assert additional objections to the production of information or documents as appropriate and to supplement or change these objections and responses. The defendant specifically reserves all objections as to the competency, materiality, and admissibility of its documents and information or the subject matter thereof, all objections as to burden, vagueness, overbreadth, and ambiguity, and all rights to object on any ground to the use of any document, or the subject matter thereof, in any subsequent proceeding, including without limitation, the trial of this or any other action.

9. The defendant's decision to provide information or documents should not be construed as: (a) a stipulation that the material is relevant; (b) a waiver of the general

objections or the objections asserted in response to specific interrogatories; (c) an admission that any such documents or information exists; (d) an agreement that requests for similar information will be traded in a similar matter; or (e) an admission regarding the relevant, admissibility, truth, or accuracy of any information or statement.

10. Whenever an objection, whether general or specific is stated herein to all or any portion of an interrogatory, and an answer is thereafter stated to all or any portion of an interrogatory, the answer is stated without waiver of any portion of the objection.

11. Unless otherwise indicated, the defendant will not answer any interrogatories or portion of interrogatories encompassed by the foregoing objections.

12. Each of the defendant's answers is subject to these General Objections and Statements.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1

Do you (Sodexho – Marriott or any other affiliate) as Sodexho or Marriott discriminate any person for any reason?

Yes---- No-----

If yes describe.

ANSWER NO. 1

Sodexho objects to this interrogatory on the grounds that it is vague, ambiguous, confusing, overly broad, and unduly burdensome. Sodexho further objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho states that it does not unlawfully discriminate against any of its employees, including but not limited

to the plaintiff.

INTERROGATORY NO. 2

Do you choose your victim for any reason?

- a. Accent
- b. Economical
- c. Class Ethnic, majority or minority

ANSWER NO. 2

Sodexho objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Sodexho further objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, Sodexho objects to this interrogatory on the ground that it is nonsensical, and cannot reasonably be interpreted as currently drafted.

INTERROGATORY NO. 3

Do you (Sodexho – Marriott) or Sodexho or Marriott have ever been suit in a big class action lawsuit base on discrimination before?

Yes---- No-----

If yes, describe

- a. When
- b. Race, Black, White or Hispanic

ANSWER NO. 3

Sodexho objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Sodexho further objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 4

Do you as Sodexho – Marriott or other affiliate have related (discrimination) pending cases of lawsuit?

- a. How many,
- b. Where
- c. Describe.

ANSWER NO. 4

Sodexho objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Sodexho further objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 5

Do you know how much a person is damaged when (he) or (she) is discriminated, no matter the basis – age – sex – national origin – disability etc.

- a. Explain

ANSWER NO. 5

Sodexho objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Sodexho further objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, Sodexho objects to this interrogatory on the ground that as currently drafted it is nonsensical and calls for a hypothetical conclusion.

INTERROGATORY NO. 6

Can you (Sodexho – Marriott) describe discrimination?

- a. What it means
- b. Types of discrimination.
- c. Is it legal or not.
- d. Are you under the law or above the law.

ANSWER NO. 6

Sodexho objects to this interrogatory on the grounds that it is compound, vague,

ambiguous, confusing, overly broad, and unduly burdensome. Sodexho further objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, Sodexho objects to this interrogatory on the ground that it seeks a legal conclusion, and the statutes governing and defining discrimination speak for themselves.

INTERROGATORY NO. 7

After, I was wrongfully terminated and discriminated did you change anything in your employee policy?

a. Explain.

ANSWER NO. 7

Sodexho objects to this interrogatory on the grounds that it is vague, ambiguous, confusing, overly broad, and unduly burdensome. Sodexho further objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, Sodexho objects to this interrogatory on the ground that it assumes that the plaintiff was wrongfully terminated and/or discriminated against which Sodexho denies.

INTERROGATORY NO. 8

Do you as Sodexho – Marriott or Marriott or Sodexho or any other affiliate own any real estate, stocks, bonds, securities, investment, automobiles, vehicles, any other financial instrument or other things of values or assets?

Yes----- No-----

a. If yes, describe list and its value..

ANSWER NO. 8

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound,

vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 9

In the last six years, did you (as Sodexho – Marriott) or Sodexho or Marriott or any affiliate sell , buy or rename any property?

Yes----- No-----

If yes, describe

- a. Its values
- b. Property name or rename.

ANSWER NO. 9

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 10

Do you have any cash, checking accounts , saving accounts, any other monetary sources, pensions, bonds, stocks, annuities, automobiles, vehicles in the name of Sodexho –Marriott or Marriott or Sodexho or any other affiliate corporation in U S A or other countries?

Yes----- No-----

If yes, describe.

- a. Amount of properties
- b. Name of the institution
- c. Its value of each one.
- d. Location

ANSWER NO. 10

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded

the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 11

In the last six years, did you as Sodexho – Marriott or Sodexho or Marriott or as an affiliate give away or donate or gift anything of value?
If yes, describe.

- a. To whom
- b. Total amount of the gift, donation etc.
- c. When
- d. If the person to whom you gave the gift asked you for the gift or donation.

ANSWER NO. 11

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 12

Do you think , you did not do anything wrong that you did not violate any federal law or state law ,civil rights or constitutional rights?

- a. Explain
- b. Your position 's statement.

ANSWER NO. 12

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P.

33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 13

Do you as Sodexho – Marriott or as Sodexho or as Marriott ever authorize any agency, any expert choose by the plaintiff of the plaintiff 's attorney to audit your assets , properties, stocks,bonds, securities,investments, automobiles, vehicles, or anything of values in the U S A or other countries .

Yes---- No-----

If yes, explain.

- a. Send the proper release form signed + notarized by Sodexho – Marriott and any other affiliate .
- b. Authorization to audit all your properties,assets as Sodexho – Marriott or Sodexho or Marriott or as any other affiliate.

ANSWER NO. 13

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 14

Can you Sodexho – Marriott explain what happened with my medical , dental insurance.

- a. Explain was it cancelled?
- b. Who did cancel it?
- c. Date and time that it was cancelled?

ANSWER NO. 14

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded

the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Finally, Sodexho objects to this interrogatory on the ground that the information requested by the plaintiff is in the plaintiff's possession and has previously been produced to Sodexho by the plaintiff.

INTERROGATORY NO. 15

Do Sodexho- Marriott usually cancel employees medical insurances when employees go home , and employees are supposed to come to work the next day.

ANSWER NO. 15

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. In addition, Sodexho objects to this interrogatory on the ground that as currently drafted it is nonsensical and calls for a hypothetical conclusion.

INTERROGATORY NO. 16

Do Sodexho- Marriott think , that anyone has the right to cancel other people medical insurance when that person is paying his own medical insurance.

ANSWER NO. 16

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Finally, Sodexho objects to this interrogatory on the ground that as currently drafted it is nonsensical and calls for a hypothetical conclusion.

INTERROGATORY NO. 17

Explain, the meaning of equal

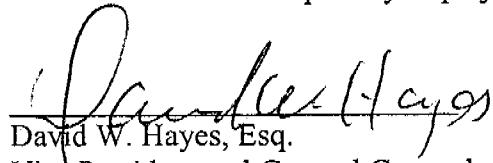
ANSWER NO. 17

Sodexho objects to this interrogatory on the ground that the plaintiff has exceeded the limit of 25 interrogatories propounded upon Sodexho, as governed by Fed. R. Civ. P. 33(a). Sodexho further objects to this interrogatory on the grounds that it is compound, vague, ambiguous, confusing, overly broad, and unduly burdensome. Moreover, Sodexho objects to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Finally, Sodexho objects to this interrogatory on the ground that it is nonsensical, and cannot reasonably be interpreted as currently drafted.

VERIFICATION

I, David W. Hayes, Esq., Vice President and Associate General Counsel of Sodexho, Inc., hereby under oath depose and state that I have reviewed the foregoing Answers to Interrogatories; that I am without personal knowledge of all matters stated in the Answers to Interrogatories; that the foregoing Answers to Interrogatories have been assembled by authorized employees and counsel for Sodexho, Inc., who have informed me that the information in the Answers to Interrogatories is true; and that to the best of my knowledge, information and belief the information set forth in the Answers to Interrogatories is true and accurate.

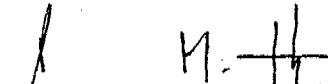
I declare under penalty of perjury that the foregoing is true and correct.



David W. Hayes, Esq.
Vice President and General Counsel

Date: April 31, 2006

as to objections:



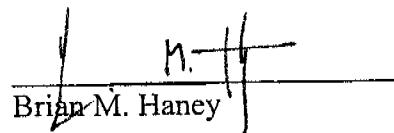
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Dated: April 25, 2006

CERTIFICATE OF SERVICE

I, Brian M. Haney, attorney for Sodexho, Inc., misnamed herein as Sodexho Marriott Services, in the above-captioned action, hereby certify that on this 25th day of April, 2006, a copy of Defendant's Answers to Plaintiff's Second Set of Interrogatories was served via first-class mail upon the plaintiff, Flavia Benitez, at the following address:

P.O. Box 302437
Jamaica Plain, MA 02130.



Brian M. Haney